



SHERWIN-WILLIAMS.

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Environmental, Health & Regulatory Services
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October 31, 2007

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Response to USEPA Comments
Kirkwood Lake Work Plan, RI/FS Activities
AOC Index Number: No. II CERCLA-02-99-2035
Gibbsboro Borough, Voorhees Township and Lindenwold Borough, New Jersey

Dear Mr. Klimcsak:

The Sherwin-Williams Company (SWC) is responding to the U.S. Environmental Protection Agency's (USEPA) comments, dated August 29, 2007, on the July 30, 2007 *Kirkwood Lake Work Plan* (KWL Work Plan) submitted to the USEPA by SWC. SWC provided the KWL Work Plan in accordance with the May 3, 2006 USEPA request.

On September 5, 2007 SWC submitted these responses in "draft" form to the USEPA and received USEPA comments on September 13, 2007. SWC has also incorporated those comments into the attached revised KWL Work Plan.

RESPONSE TO EPA COMMENTS DATED AUGUST 29, 2007

USEPA General Comment

The July 30, 2007 Work Plan adequately presents data that was previously collected under USEPA Administrative Order on Consent (AOC) Index No. II Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA) – 02-99-2035, as well as presents the (current) proposed sampling program; however, the Work Plan should also cite the quality assurance/quality control (QA/QC) procedures that are to be implemented. It is being requested that the approved (site specific) 2003 RI/FS Quality Assurance Project Plan (QAPP) be referenced, as well as a brief discussion of the analytical methods (with detection limits), data validation standard operating procedures (SOPs), QA sampling procedures (i.e., duplicates, etc.), field sampling, field equipment decontamination (SOPs), and any other applicable procedures be discussed or included as

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attachments. In addition, USEPA is requesting that the SWC include all cited RI/FS memos or documents be included as attachments.

SWC Response

SWC has revised the KWL Work Plan to include a discussion on the QA/QC information referenced above including a detailed sampling approach discussion and sampling SOPs.

SWC has attached RI/FS memos and documents that are referenced in the revised KWL Work Plan, or USEPA comment letter, within the KWL Work Plan.

USEPA Specific Comments

1. The subject or title block of the July 30, 2007 (Work Plan) transmittal letter should be corrected to reflect the accurate name of the site as well as the accurate location. It should reference the AOC Index Number: No. II CERCLA-02-99-2035, and the location should be changed from Gibbsboro to Voorhees Township and Lindenwold Borough, New Jersey.

SWC Response

The title block section of this response has been revised to include the above information. Also, future correspondence will include the AOC Index No. and CERCLA citation.

USEPA Specific Comments

2. **Summary of Previous Investigations**, page 3 - The acronym OSC is used for the first time, please provide the complete term.

SWC Response

This acronym is "On-Scene Coordinator" and was defined in the work plan in the second paragraph of p. 3.

USEPA Specific Comments

3. **Proposed Work Plan Activities (Soil Sampling)**, page 7
 - a. The general procedures used to select the specific soil sample locations, both those for the proposed soil samples at the southern end of the transects as well as the suspect soil samples, should be provided. In other words, please provide an explanation as to the horizontal distance from the lakes edge that the sample location will be selected (i.e, will it be based on relief near the waters edge vs. if there is a relatively flat area; or will it be based on a universal step-out approach).

SWC Response

SWC has expanded the discussion in the Work Plan to address USEPA's questions regarding soil sample locations.

USEPA Specific Comments

- b. USEPA is requesting that 2 additional soil sample locations be placed at the northern end of transects KWT-1 and KWT-2. The locations of the previously collected soil samples (i.e., those collected under USEPA Removal Order - AOC Index No. II CERCLA-02-99-2037) are unclear; however, the proposed samples should be collected in accordance with the procedures outlined in this Work Plan.

SWC Response

SWC will add 2 soil sampling locations as per USEPA's recommendation above and will collect samples in accordance with the KWL Work Plan. These additional soil sample locations were added to the revised KWL Work Plan.

USEPA Specific Comments

- c. Additional horizontal and vertical delineation soil sampling may be required based upon the results of this phase of sampling.

SWC Response

SWC acknowledges that additional sampling may be required based on the results of this sampling effort.

USEPA Specific Comments

4. Proposed Work Plan Activities (Sediment Sampling), page 7

- a. USEPA does not approve the use of *Field Change Request Form No. 11 - Bridgewood Lake Protocol for Sediment Sampling at Depth* (29 August 2005). As previously indicated in USEPA's June 11, 2007 Comment Letter on Bridgewood Lake and the Railroad Site, USEPA does not concur with the SWC's interpretation that the sediment contamination is contained to the fine-grained layer as opposed to the consolidated coarser-grained sand and silt layer. Therefore, USEPA is requesting that the sediment sampling approach (0-0.5 ft. - 2.5 - 3.0 ft. interval) outlined by USEPA in the USEPA May 3, 2006 letter to SWC be utilized. In addition, the XRF Sampling procedures (which

includes the proposal to collect confirmatory samples as well) utilized throughout the 2006 RI sediment sampling activities will be continued.

SWC Response

SWC has included more details on the sampling approach and procedures specific to Kirkwood Lake in the revised KWL Work Plan.

In addition, SWC will incorporate the use of XRF screening into the sampling program, where feasible. XRF screening will be conducted within the consolidated unit forming the base of the lake. It is not possible to utilize XRF technologies in the organic matter above this unit due to the extremely high water content and fine nature of the material.

USEPA Specific Comments

- b. USEPA is requesting that an additional suspect sediment sample location be collected from within the shallow cove due east of KWT-50.

SWC Response

SWC will collect the additional suspect sediment sample referenced above. These sampling locations were added to the revised KWL Work Plan.

USEPA Specific Comments

- c. The proposed sediment sample below the outfall at the western end of Kirkwood Lake should be collected from an area that is likely to incur sediment deposition and not scouring. In addition, USEPA is requesting that an additional sediment sample location be located 150 ft. downstream of the White Horse Pike overpass.

SWC Response

SWC concurs with USEPA's request above and will collect the sediment sample below the outfall at the western end of the Kirkwood Lake from a depositional area. SWC will also add an additional sediment sample location 150 ft. downstream of White Horse Pike overpass. This sample location was added to the revised KWL Work Plan.

USEPA Specific Comments

- d. Additional horizontal and vertical delineation sediment sampling may be required based upon the results of this phase of sampling.

SWC Response

SWC acknowledges that additional sampling may be required based on the results of this sampling effort.

USEPA Specific Comments

5. Proposed Work Plan Activities (Surface Water Sampling), page 8

- a. Please provide the depths from which the July 26, 2002 surface water samples (2) were collected from Kirkwood Lake.

SWC Response

The July 26, 2002 surface water samples were grab samples collected from the surface. This information has been incorporated into the revised KWL Work Plan.

USEPA Specific Comments

- b. USEPA is requesting that an additional surface water sample be collected from KWT-10.

SWC Response

SWC will collect the additional surface water sample referenced above. This sample has been added to the revised KWL Work Plan.

USEPA Specific Comments

- c. Additional horizontal and vertical delineation surface water sampling (including pore water samples) may be required based upon the results of this phase of sampling.

SWC Response

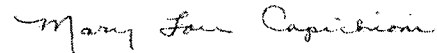
SWC acknowledges that additional sampling may be required based on the results of this sampling effort.

RESPONSE TO EPA COMMENTS DATED SEPTEMBER 13, 2007

Sherwin-Williams concurred with USEPA comments 1 through 5 and have revised the Work Plan accordingly.

Should you have any comments or questions, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com. We hope to start our sampling program in Kirkwood Lake as soon as possible.

Sincerely,



Mary Lou Capichioni
Director Remediation Services

cc: Jeff Josephson, USEPA-Reg.2
Mindy Pensak, USEPA-Reg.2
William Sy, USEPA-Reg.2
Clay Stern, USFWS
Diane Wehner, NOAA
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Lynn Arabia, TetraTech ECI
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